

U S WEST

Checklist Item #4 - Unbundled Local Loops

Checklist Item #5 - Unbundled Local Transport

Checklist Item #6 - Unbundled Local Switching

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August 12, 1999

Unbundled Local Loop

Checklist Item 4 Requirements

The Act

271(c)(2)(B)(iv) Local loop transmission from the central office to the customer's premises, unbundled from local switching or other services.

FCC Actions

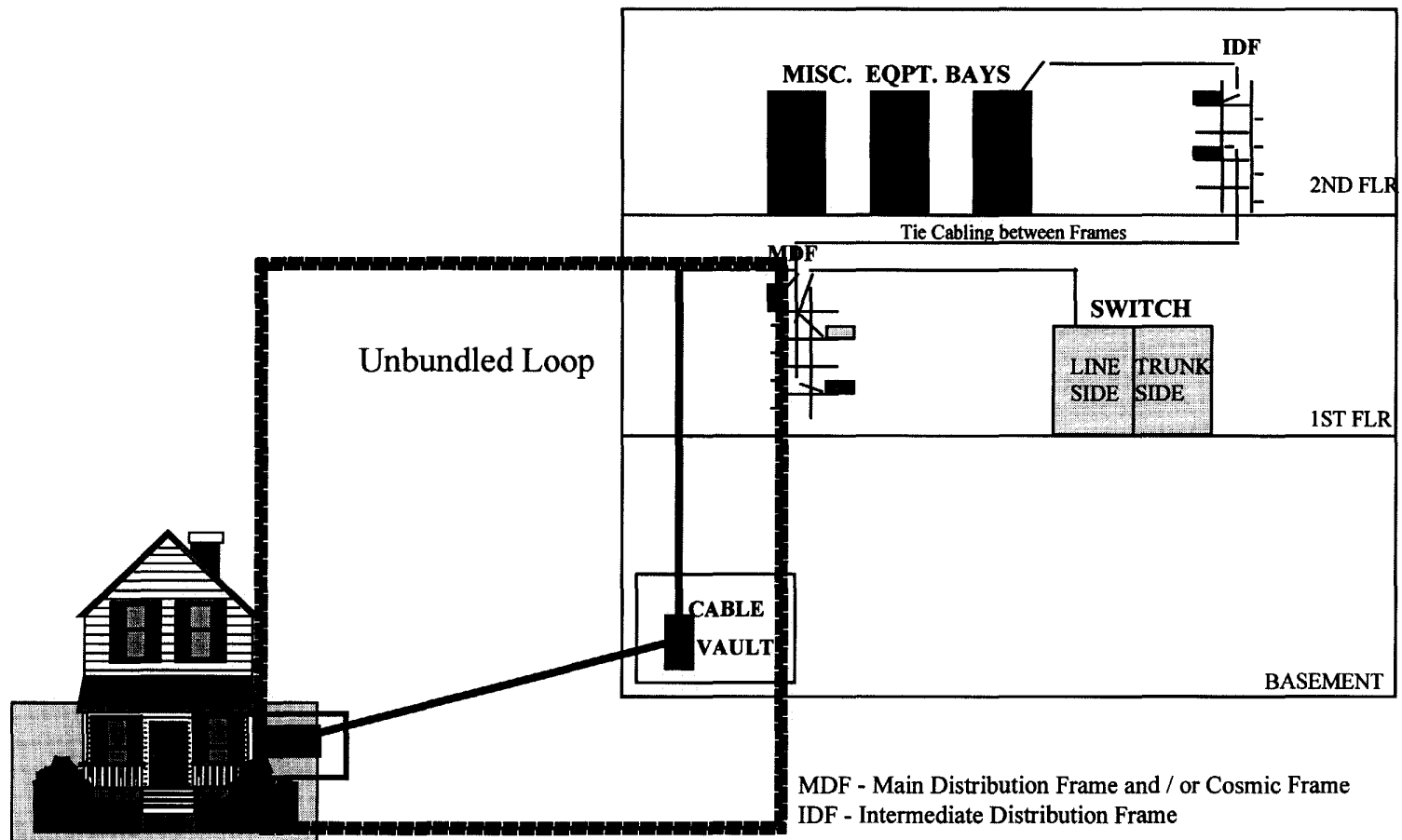
(vacated) FCC Rule 51.319 (a) (b) defines two separate UNEs associated with the local loop:

- Local Loop- The local loop network element is defined as a transmission facility between a distribution frame (or its equivalent) in an incumbent LEC central office and an end user customer premises.
- Network Interface Device (NID) - The network interface device network element is defined as a cross-connect device used to connect loop facilities to inside wiring.

Bell South LA II Order ¶ 198

- provisioning of unbundled loops has no retail analogue
- unbundled loop must be provided in a manner that offers an efficient carrier a meaningful opportunity to compete

Unbundled Local Loop Diagram



U S WEST Provides Access to Unbundled Loops

Loop Types:

- 2 and 4-wire analog loops
- 2 and 4-wire non-loaded loops
- Digital Capable loops for services such as ISDN or DS1

Installation Options:

- Basic Installation Option for Existing Service
- Basic Installation with Performance Testing Option for New Service
- Coordinated Installation with Cooperative Testing Option

The SGAT, Sections 9.2.2 and 9.2.4, not only commits U S WEST to provision and maintain these loops, it also commits to standard installation intervals

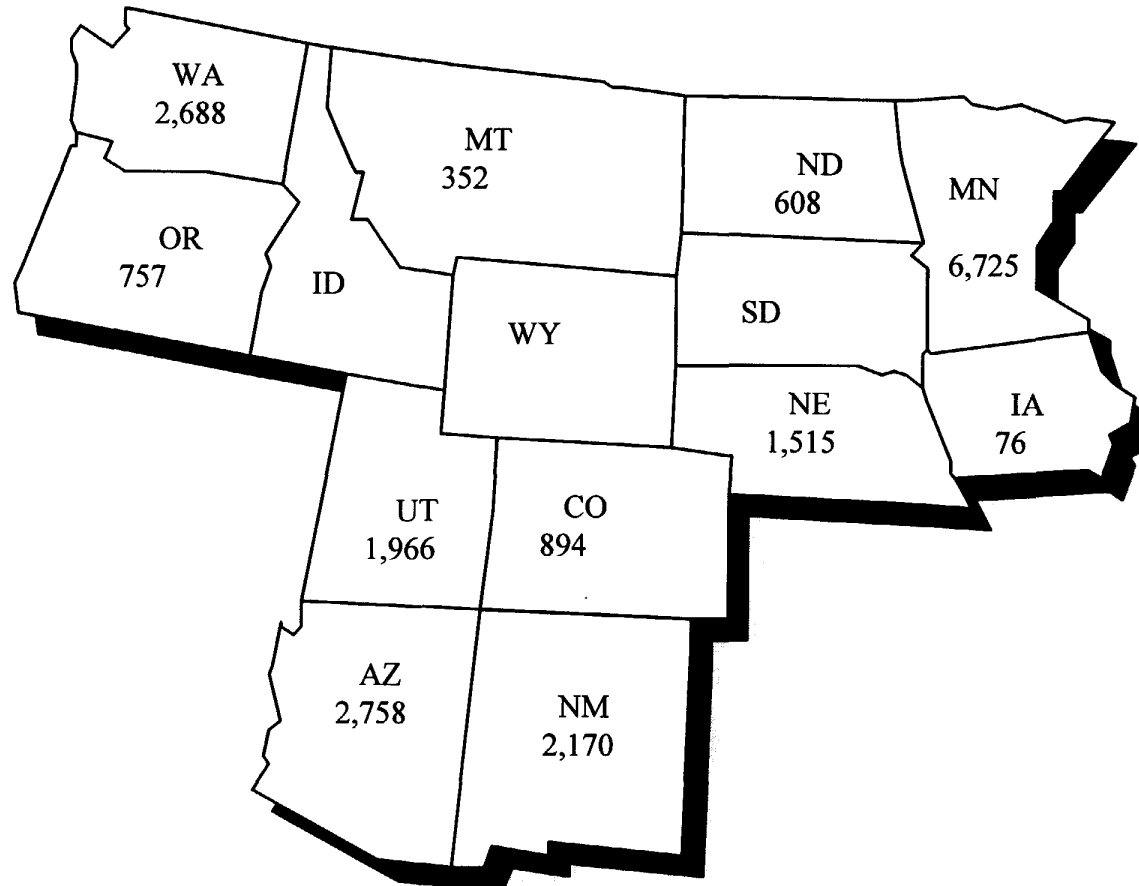
U S WEST Provides CLECs Unbundled Access to the NID

U S WEST provides two options:

- CLEC installs its own NID and runs a jumper from its NID to the U S WEST NID, or
- CLEC terminates its loops in the U S WEST NID (space permitting)

The SGAT, Section 9.3.3.1, provides the CLEC the additional option of ordering a modular NID to replace an existing non-modular NID for ease in testing.

U S WEST Provides Over 20,000 Unbundled Local Loops to CLECs in 14 States



Local Transport Checklist Item 5 Requirements

The Act

271 (c)(2)(B)(v) Local transport from the trunk side of a wireline local exchange carrier switch unbundled from switching or other services.

FCC Actions

(vacated) FCC Rule 51.319 (d)(1)(i), (d)(1)(ii) defines two general categories of local transport

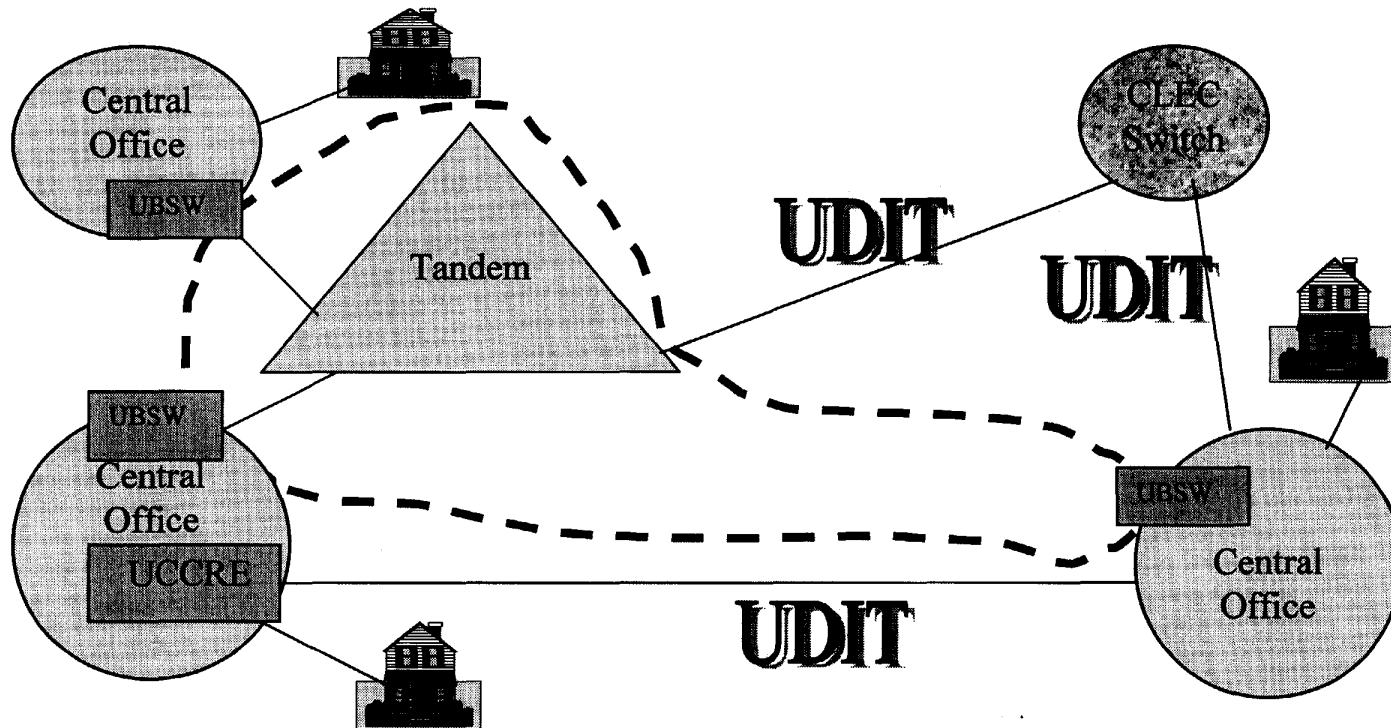
- Dedicated Transport - incumbent LEC transmission facilities dedicated to a particular or carrier...
- Shared Transport - Transmission facilities shared by more than one carrier, including the incumbent LEC...

U S WEST Offers *All* Required Transport Options

Nebraska SGAT offers:

- Unbundled Dedicated Interoffice Transport (UDIT)- at all technically feasible transmission capabilities, such as DS0, DS1, DS3, SONET, and OC-n. (section 9.4.1.1)
- UDIT includes interoffice facilities between end offices and serving wire centers (SWCs), SWCs and IXC POPs, tandem switches and SWCs, end office or tandems of U S WEST, and the wire centers of U S WEST and requesting carriers.
- Shared transport includes all interoffice transmission facilities shared by more than one carrier, including U S WEST, between end office switches, between end office switches and tandem switches, and between tandem switches, and U S WEST's network. (section 9.5.1.1)
- Shared transport is available only in conjunction with unbundled switching; switches perform the routing functions, using the same routing table used by U S WEST, for the access to the transport network. (section 9.5.1.2)
- Unbundled Customer Controlled Rearrangement Element (UCCRE) allows a CLEC to control UNE or ancillary services configurations on a near real time basis through a digital cross connect device (DCS) using dial up or attendant access. (section 9.6.1.1)

Unbundled Transport Diagram



UNBUNDLED TRANSPORT

- SHARED TRANSPORT - all transport within the dotted line, in conjunction with unbundled switching (UBSW)
- UDIT- direct connection between two points; DS0 through OC-n
- UCCRE (Unbundled Customer Controlled Reconfiguration Element) - option available to allows CLEC to control UNE or ancillary service configurations in connection with UDIT.

Status of Unbundled Transport UNEs

- U S WEST offers UDIT as a result of binding arbitration agreements and in the SGAT; shared transport and UCCRE are offered via the SGAT
- U S WEST has the pre-ordering, ordering, provisioning, repair and billing processes in place for a CLEC to order UDIT, shared transport, or UCCRE.
- U S WEST has successfully tested its ability to install and bill UDIT, unbundled switching and shared transport, and UCCRE

Unbundled Local Switching Checklist Item 6 Requirements

The Act

271 (c)(2)(B)(vi) Local switching unbundled from transport, local loop transmission, or other services.

FCC actions

(vacated) FCC Rule 51.319 (c)(1)(i)(A)(B)(C) defines local switching

- Line-side, Trunk-side facilities, and all features, functions, and capabilities of the switch

Bell South LA II Order ¶ 201, and ¶ 219

Local switching includes line-side and trunk-side facilities

- Features, functions, and capabilities of the switch
- All vertical features
- Any technically feasible custom routing functions

“ A BOC must activate any vertical feature or combination of vertical features requested by a competing carrier unless ... (it) is not technically feasible”

U S WEST Offers *All* Unbundled Local Switching Options

U S WEST offers:

- Line side Ports
 - Analog Line Port
 - Digital Line Port
- Unbundled Local Switching
- Access to all Vertical Features installed in the switch

A CLEC must use BFR process to request features not yet activated in the switch
- Unbundled Tandem Switching
- Custom Routing (where technically feasible)
- Access to 911/E911, Operator Services & DA

Status of Unbundled Local Switching

- U S WEST has binding interconnection agreements and SGATs to offer unbundled local switching
- U S WEST makes a binding commitment to offer all vertical features on an unbundled basis in the SGAT
- U S WEST has successfully tested the processes for a CLEC to pre-order, order, provision, repair, and bill unbundled local switching

Unbundled Local Transport and Local Switching Bench Test

Purpose of Bench Test

- Validate U S WEST's advocacy on checklist items #5 and #6
- Provide evidence of processes and procedures for timely pre-ordering, ordering, provisioning, repairing, and billing of Unbundled Local Transport and Unbundled Local Switching
- Test customized routing, OS/DA call completion, and branding
- Re-enforce results of 1998 laboratory test in production systems

Unbundled Local Transport and Local Switching Bench Test

Results of the Bench Test

- Orders were successfully processed through all production systems
- All standard interval installation due dates were met
- Accurate billing statements were produced by U S WEST
- After provisioning was completed, trouble reports were created and processed to validate repair procedures
- Test calls produced accurate call completion and correct branding based on the customized routing Line Class Codes requested

How Does a CLEC Access UNEs?

Collocation

- Caged Physical
- Virtual
- Cageless Physical
- Interconnection Distribution Frame (ICDF)

Bona Fide Request Process (BFR) can be used by a CLEC to request unique access to UNE configurations.

SGAT, section 9.1.2, requires U S West to allow a CLEC to access preexisting combinations of network elements after the FCC issues a replace Rule 319.